

# RCRA Compliance Evaluation Inspection (CEI) Report

Hecla Mining Company

~~UTD982589848~~

UTD982590002  
is the correct  
Facility #  
Typo in Title

UTD 982590002



September 24, 2003

Prepared by  
Eric R. Johnson

TECHNICAL ENFORCEMENT PROGRAM  
OFFICE OF ENFORCEMENT,  
COMPLIANCE AND ENVIRONMENTAL JUSTICE

Date of Inspection: September 24, 2003

Facility: Hecla Mining Company  
Mile 15, Highway 91 West  
St. George, Utah 84771  
Shivwits Band of the Paiute Indian Reservation

Facility Contact: Mr. Paul L. Glader  
Environmental Services Manager  
(208) 769-4112

Notification: Treat, store and dispose hazardous waste

Applicable Regulations: Utah Administrative Code, R315  
Federal - 40 C.F.R. Parts 260 - 270

Type of Inspection: Compliance Evaluation Inspection

Participants: Eric Johnson, EPA  
Paul L. Glader, Environmental Services Mgr, Hecla

Weather Conditions: 9/24/03 Sunny, 55-60°F

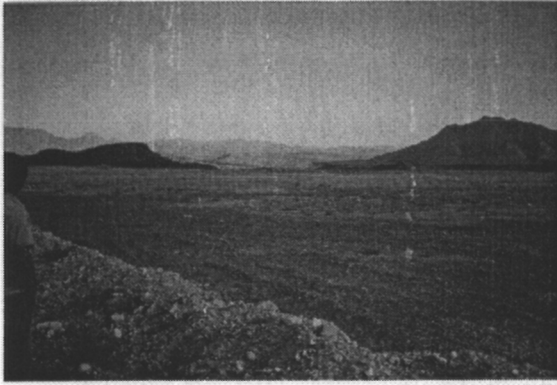
Time of Arrival: 8:15 am

Time of Departure: 10:27 am

Report Prepared By: Eric Johnson

## **I. Facility Description**

Pursuant to an Amendment to Lease entered into between Hecla and the Shivwits Band of Paiute Indian Tribe on September 25, 1995, Hecla leases and is responsible for a waste facility located on the Reservation. The facility is located on approximately 8.28 acres of the original site lease and principally consists of a 500-foot diameter pond ("Pond #2") filled with



**Figure 1 :** Pond #2 (wastepile).

waste materials from earlier mining activities and adjacent evaporation pond (Figure 1). Pond #2 contains an open leachate collection trench partially constructed around its southwest side that collects runoff and drains it into the evaporation pond also located on its southwest side.

The facility is located on the eastern slope of the Beaver Dam Mountains in an area that drains generally to the east towards the Santa Clara River. There are no streams or springs on or adjacent to the facility, the nearest surface water is the Santa Clara River, a tributary of the Virgin River, approximately

2.5 miles away. Runoff from the facility and Pond #2 outside the collection trenches drains in a northeasterly direction into a catchment basin currently maintained by OMG Americas, Inc.

Livestock grazing and mining have comprised the two major uses of land in and around the facility. Although no grazing leases presently exist on the facility, cattle have been observed in the immediate area. Cattle use the catchment basin as a stock watering pond.

Hecla currently employs one person to perform maintenance of the leachate collection trench and evaporation pond at the facility. Two corporate individuals are responsible for environmental compliance of Pond #2.

## **II. Credentials, Purpose and Scope**

At approximately 8:15 a.m. on September 24, 2003, Mr. Eric Johnson arrived at the OMG Apex, Inc. facility where he met with Mr. Paul L. Glader, an Environmental Services Manager for Hecla Mining Company. Mr. Johnson indicated that the purpose of the visit was to conduct a compliance evaluation inspection (CEI) at the Hecla Mining Company facility (Pond #2), and to investigate the condition of the collection trenches. Other participants in the pre-inspection meeting and facility inspection included: Tara Marlowe (Tribal Environmental Director, Paiute Indian Tribe of Utah), Freddy Bigfeet (Shivwits Band of the Paiute Tribe), Lawrence Snow (Shivwits Band of the Paiute Tribe), Delyce Thom (Paiute Indian Tribe of Utah), and Gerald Kanosh (Shivwits Band of the Paiute Tribe).

NOTE: In a letter dated August 21, 2003, Glenn Rodgers, Chairman, Shivwits Band of the Paiute Tribe, was notified of EPA's pending inspection at the Hecla Mining Company facility on September 24, 2003. A copy of this final inspection report will be provided to Mr. Rodgers.

### **III. Pre-Inspection Discussion**

After the initial introductions, the inspection focused on recent developments in the closure of the Hecla's Pond #2. The following topic was discussed during the inspection:

#### **Engineering Report for Pond 2 Final Closure**

Mr. Glader described the general concepts proposed by Hecla in their draft Engineering Report for Pond #2 Final Closure ("Engineering Report") recently submitted to EPA, Region 8 for review and comment.

The Engineering Report, prepared by Monster Engineering Incorporated of Laporte, Colorado, details waste material sampling and analysis, potential borrow source materials investigation, closure alternatives, construction sequencing for the selected alternative, and cost estimates.

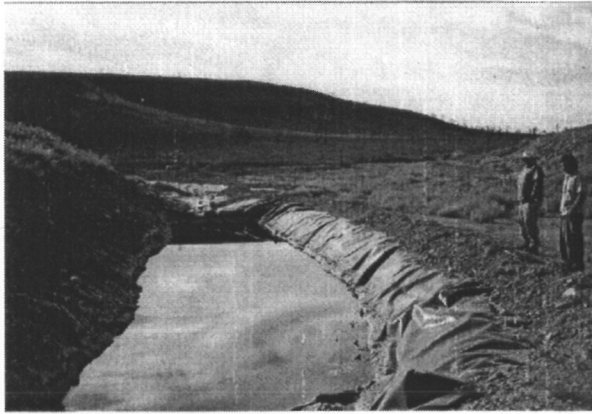
There were several concerns raised by Tribal representatives during the discussion of the draft Engineering Report:

- (1) Will there be any seepage from Pond #2 that will reach off-site, including groundwater and surface water?
- (2) What are the sampling results for the site investigation conducted by Hecla - the investigation completed to determine if any leachate had migrated away from Pond #2?
- (3) What is the cost of complete wastepile removal? Was this considered as one of the alternatives in the Engineering Report?
- (4) How many years will Hecla monitor Pond #2 after the area has undergone final closure? Does post-closure monitoring include ground water?

Mr. Glader agreed to consider the Tribe's comments and concerns in the next draft of the Engineering Report. A draft copy will be provided to the Paiute Tribe of Utah and Shivwits Band of the Paiute Tribe for review and comment before it becomes a final draft.

### **IV. Site Tour**

At the time of the inspection, leachate from Pond #2 appeared to be seeping into the open leachate collection trench partially constructed around its southwest side. The exact source of the liquid/leachate was hard to determine, because the liquids could have been from rain water. All of the leachate appeared to be contained within the structure. There was no evidence of these liquids overflowing outside of the ponds (Figure 2)..



**Figure 2 : Leachate collection ditch**

Surface drainage is directed around the leachate containment ponds. Pond #2 is partially capped with soil from construction of ponds 3B and 3C in a dome-shaped cover. The cover is designed to control leachate collection of the wet waste materials by forcing the waste liquids out of Pond #2 into a small lined trench. The trench flows into a small lined evaporation pond adjacent to Pond #2. The liner for both the trench and evaporation pond is high-density polyethylene (HDPE) and was in good condition.

A wildfire occurred throughout the area this past spring, which will increase surface runoff to diversion ditches around the waste pile.

#### **V. Record Reviews**

There were no records to review during this inspection.

#### **VI. Close-Out Meeting**

Mr. Johnson filled out a Notice of Inspection Form (Attachment A) which did not identify any concerns (probable violations of EPA laws or regulations). Mr. Glader agreed that the Paiute Indian Tribe of Utah (Tara Marlowe) and Shivwits Band of the Paiute Tribe (Glenn Rodgers) will receive a copy of: (1) the most recent sampling analysis report detailing results for samples collected around Pond #2 (to determine if leachate had extended beyond the wastepile); and (2) the next draft of the Engineering Report for review and comment.

Prepared by:

*Eric R. Johnson*

Eric R. Johnson, RCRA Inspector  
U.S. EPA Region VIII  
Technical Enforcement Program

*10/19/03*

Date

Attachment A - Notice of Inspection Form





**PAUL L. GLADER, P.E.**

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Environmental Services

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